

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually,  
and as Parents of BRETT LOVELACE,  
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and  
MARK P. CLEMONS,

Defendants.

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**PLAINTIFFS' NOTICE TO TAKE DEPOSITION  
OF MARK P. CLEMONS, M.D.**

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TO: J. Kimbrough Johnson  
Marcy Dodds Magee  
Margaret Cooper  
2900 One Commerce Square  
40 S. Main Street  
Memphis, TN 38103

Please take Notice that the Plaintiffs in this action will take the evidentiary deposition of the Defendant, Mark P. Clemons, M.D., pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a Notary Public or before some other officer authorized by law to administer oaths, and will continue from day to day until completed as follows:

**DEPONENT:** Mark P. Clemons, M.D.

**DATE:** Thursday, February 6, 2014

**TIME:** 10:00 a.m.

**PLACE:** Thomason Hendrix, et al  
2900 One Commerce Square  
40 S. Main Street  
Memphis, TN 38103

Respectfully submitted,

HALLIBURTON & LEDBETTER



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

J. Kimbrough Johnson/Marcy Dodds Magee/Margaret Cooper  
2900 One Commerce Square  
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Attorneys for Mark Clemons  
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[amclean@hard-law.com](mailto:amclean@hard-law.com)

This 23<sup>rd</sup> day of December, 2013.

A handwritten signature in blue ink, appearing to read "Mark Ledbetter", with a stylized flourish at the end.

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MARK LEDBETTER, Certifying Attorney